

Exhibit E

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

MICHELLE GORE,

Plaintiff,

v.

NEW PRIME, INC., ACE AMERICAN
INSURANCE COMPANY, and TYLER
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

**ANSWER AND DEFENSES OF DEFENDANT ACE AMERICAN INSURANCE
COMPANY TO PLAINTIFF'S COMPLAINT**

COME NOW ACE American Insurance Company (hereinafter "Defendant" or "this defendant"), named defendant in the above-styled action, and files the following Answer and Defenses to Plaintiff's ("Complaint"), showing the Court as follows:

FIRST DEFENSE

The Complaint fails to set forth a claim against Defendant upon which relief can be granted.

SECOND DEFENSE

Plaintiff's injuries, if any, were caused by an unforeseeable intervening third-party tortfeasor and / or the acts and failure to act of persons or entities other than Defendant.

THIRD DEFENSE

Defendant is not liable to Plaintiff because Defendant breached no duty owed to Plaintiff in regard to the occurrence giving rise to this Complaint.

FOURTH DEFENSE

Any injury allegedly suffered by Plaintiff was not proximately caused by Defendant.

FIFTH DEFENSE

Defendant is an improper defendant in this litigation. There is no basis for its inclusion as a party defendant, under Georgia's Direct Action Statute or otherwise.

SIXTH DEFENSE

Defendant reserves the right to plead and prove such other defenses as may become known during the course of investigation and discovery.

SEVENTH DEFENSE

As a Seventh Defense, Defendant answer the numbered paragraphs of the Complaint as follows:

1.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 1 of the Complaint, and, therefore, cannot admit or deny same.

2.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 2 of the Complaint, and, therefore, cannot admit or deny same.

3.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 3 of the Complaint, and, therefore, cannot admit or deny same.

4.

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 4 of the Complaint, and, therefore, cannot admit or deny same.

5.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 5 of the Complaint, and, therefore, cannot admit or deny same.

6.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 6 of the Complaint, and, therefore, cannot admit or deny same.

7.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 7 of the Complaint, and, therefore, cannot admit or deny same.

8.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 8 of the Complaint, and, therefore, cannot admit or deny same.

9.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 9 of the Complaint, and, therefore, cannot admit or deny same.

10.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 10 of the Complaint, and, therefore, cannot admit or deny same.

11.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 11 of the Complaint, and, therefore, cannot admit or deny same.

12.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 12 of the Complaint, and, therefore, cannot admit or deny same.

13.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 13 of the Complaint, and, therefore, cannot admit or deny same.

14.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 14 of the Complaint, and, therefore, cannot admit or deny same.

15.

Defendant is without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 15 of the Complaint, and, therefore, cannot admit or deny

same.

16.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 16 of the Complaint, and, therefore, cannot admit or deny same.

17.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 17 of the Complaint, and, therefore, cannot admit or deny same.

18.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 18 of the Complaint, and, therefore, cannot admit or deny same.

19.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 19 of the Complaint, and, therefore, cannot admit or deny same.

20.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 20 of the Complaint, and, therefore, cannot admit or deny same.

21.

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 21 of the Complaint, and, therefore, cannot admit or deny same.

22.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 22 of the Complaint, and, therefore, cannot admit or deny same.

23.

Defendants reallege and reincorporates each response and defenses as if fully restated.

24.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 24 of the Complaint, and, therefore, cannot admit or deny same.

25.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 25 of the Complaint, and, therefore, cannot admit or deny same.

26.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 26 of the Complaint, and, therefore, cannot admit or deny same.

27.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 27 of the Complaint, and, therefore, cannot admit or deny

same.

28.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 28 of the Complaint, and, therefore, cannot admit or deny same.

29.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 29 of the Complaint, and, therefore, cannot admit or deny same.

30.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 30 of the Complaint, and, therefore, cannot admit or deny same.

31.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 31 of the Complaint, and, therefore, cannot admit or deny same.

32.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 32 of the Complaint, and, therefore, cannot admit or deny same.

33.

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 33 of the Complaint, and, therefore, cannot admit or deny same.

34.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 34 of the Complaint, and, therefore, cannot admit or deny same.

35.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 35 of the Complaint, and, therefore, cannot admit or deny same.

36.

Defendant denies the allegations contained in Paragraph No. 36 of the Complaint.

37.

Defendant admits it issued an excess liability to Defendant New Prime. Defendant is without information or knowledge sufficient to form a belief as to the allegations remained in Paragraph No. 37 of the Complaint, and, therefore, cannot admit or deny same.

38.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 38 of the Complaint, and, therefore, cannot admit or deny same.

39.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 39 of the Complaint, and, therefore, cannot admit or deny

same.

40.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 40 of the Complaint, and, therefore, cannot admit or deny same.

41.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 41 of the Complaint, and, therefore, cannot admit or deny same.

42.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 42 of the Complaint, and, therefore, cannot admit or deny same.

43.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 43 of the Complaint, and, therefore, cannot admit or deny same.

44.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 44 of the Complaint, and, therefore, cannot admit or deny same.

45.

Defendant is without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 45 of the Complaint, and, therefore, cannot admit or deny same.

46.

Defendant is without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 46 of the Complaint, and, therefore, cannot admit or deny same.

47.

Defendants deny the allegations contained in Paragraph No. 47 of the Complaint.

48.

Defendants deny the allegations contained in Paragraph No. 48 of the Complaint.

49.

Any allegations contained in Plaintiff's Complaint not herein responded to by number, including Plaintiff's *ad damnum* clause, and its subparts are hereby denied.

WHEREFORE, having fully answered, Defendants pray the Complaint be dismissed with costs of this action cast against Plaintiffs.

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.
ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftcurrie.com

SWIFT, CURRIE, McGHEE & HIERS, LLP
1420 Peachtree Street NE, Suite 800
Atlanta, Georgia 30309
(404) 874-8800 Phone
(470) 600-5990 Fax

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LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing *Answer and Defenses of ACE American* via Electronic Mail and via the Odyssey E-File and Serve System which will automatically send an electronic copy of same to all counsel and parties of record as follows:

Thomas Rainey, Esq.
MORGAN & MORGAN ATLANTA PLLC
PO Box 57007
Atlanta, GA 30343
trainey@forthepeople.com
Attorneys for the Plaintiff

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.
ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftcurrie.com
Attorney for the Defendant

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LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

**DEFENDANT ACE AMERICAN INSURANCE COMPANY'S
DEMAND FOR JURY PANEL OF TWELVE**

COME NOW ACE American Insurance Company (hereinafter "Defendant" or "this defendant"), named defendant in the above-styled action, by and through his attorneys, and demands in writing prior to the commencement of the trial term that the above-styled case be tried by a jury of twelve, pursuant to O.C.G.A. § 15-12-122.

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.
ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftpcurrie.com
Attorney for the Defendant

SWIFT, CURRIE, McGHEE & HIERS, LLP
1420 Peachtree Street NE, Suite 800
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LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the within and foregoing **Defendant Ace American Insurance Company's Demand for Jury Panel of Twelve** upon all parties via the Odyssey E-File and Serve System which will electronically send an electronic copy of same to the following counsel and parties of record:

Thomas Rainey, Esq.
MORGAN & MORGAN ATLANTA PLLC
PO Box 57007
Atlanta, GA 30343
trainey@forthepeople.com
Attorneys for the Plaintiff

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

beth.bentley@swifcurrie.com

Attorney for the Defendant

SWIFT, CURRIE, McGHEE & HIERS, LLP
1420 Peachtree Street NE, Suite 800
Atlanta, Georgia 30309
(404) 874-8800 Phone
(470) 600-5990 Fax

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

MICHELLE GORE,

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NEW PRIME, INC., ACE AMERICAN
INSURANCE COMPANY, and TYLER
LEE COOPER,

Defendants.

Civil Action File No. 23-EV-001543

**ANSWER AND DEFENSES OF DEFENDANT NEW PRIME, INC.
AND TYLER LEE COOPER**

COME NOW New Prime, Inc. and Tyler Cooper (hereinafter "Defendants" or "this defendant"), named defendants in the above-styled action, and file the following Answer and Defenses to Plaintiff's ("Complaint"), showing the Court as follows:

FIRST DEFENSE

The Complaint fails to set forth a claim against Defendants upon which relief can be granted.

SECOND DEFENSE

Plaintiff's injuries, if any, were caused by an unforeseeable intervening third-party tortfeasor and / or the acts and failure to act of persons or entities other than Defendants.

THIRD DEFENSE

Defendants are not liable to Plaintiff because Defendants breached no duty owed to Plaintiff in regard to the occurrence giving rise to this Complaint.

FOURTH DEFENSE

Any injury allegedly suffered by Plaintiff was not proximately caused by Defendants.

FIFTH DEFENSE

Service of process was insufficient as to Defendant Cooper and he should therefore be dismissed from this litigation.

SIXTH DEFENSE

Defendants reserve the right to plead and prove such other defenses as may become known during the course of investigation and discovery.

SEVENTH DEFENSE

As a Seventh Defense, Defendants answer the numbered paragraphs of the Complaint as follows:

1.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 1 of the Complaint, and, therefore, cannot admit or deny same.

2.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 2 of the Complaint, and, therefore, cannot admit or deny same.

3.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 3 of the Complaint, and, therefore, cannot admit or deny same.

4.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 4 of the Complaint, and, therefore, cannot admit or deny same.

5.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 5 of the Complaint, and, therefore, cannot admit or deny same.

6.

Defendant admit the allegations contained in Paragraph No. 6 of the Complaint.

7.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 7 of the Complaint, and, therefore, cannot admit or deny same.

8.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 8 of the Complaint, and, therefore, cannot admit or deny same.

9.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 9 of the Complaint, and, therefore, cannot admit or deny same.

10.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 10 of the Complaint, and, therefore, cannot admit or deny same.

11.

Defendants admit Defendant Lee was driving a 2019 Freightliner tractor-trailer on its behalf when the collision occurred, but are without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 11 of the Complaint, and, therefore, cannot admit or deny same.

12.

Defendants admit the allegations contained in Paragraph No. 8 of the Complaint.

13.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 13 of the Complaint, and, therefore, cannot admit or deny same.

14.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 14 of the Complaint, and, therefore, cannot admit or deny same.

15.

Defendants are without information or knowledge sufficient to form a belief as to the allegations remaining in Paragraph No. 15 of the Complaint, and, therefore, cannot admit or deny same.

16.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 16 of the Complaint, and, therefore, cannot admit or deny same.

17.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 17 of the Complaint, and, therefore, cannot admit or deny same.

18.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 18 of the Complaint, and, therefore, cannot admit or deny same.

19.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 19 of the Complaint, and, therefore, cannot admit or deny same.

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Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 20 of the Complaint, and, therefore, cannot admit or deny same.

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Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 21 of the Complaint, and, therefore, cannot admit or deny

same.

22.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 22 of the Complaint, and, therefore, cannot admit or deny same.

23.

Defendants reallege and reincorporates each response and defenses as if fully restated.

24.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 24 of the Complaint, and, therefore, cannot admit or deny same.

25.

Defendant admit the allegations contained in Paragraph No. 25 of the Complaint.

26.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 26 of the Complaint, and, therefore, cannot admit or deny same.

27.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 27 of the Complaint, and, therefore, cannot admit or deny same.

28.

Defendants are without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 28 of the Complaint, and, therefore, cannot admit or deny same.

29.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 29 of the Complaint, and, therefore, cannot admit or deny same.

30.

Defendants deny the allegations contained in Paragraph No. 30 of the Complaint.

31.

Defendants deny the allegations contained in Paragraph No. 31 of the Complaint.

32.

Defendants deny the allegations contained in Paragraph No. 32 of the Complaint.

33.

Defendants deny the allegations contained in Paragraph No. 33 of the Complaint.

34.

Defendants deny the allegations contained in Paragraph No. 34 of the Complaint.

35.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 35 of the Complaint, and, therefore, cannot admit or deny same.

36.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 36 of the Complaint, and, therefore, cannot admit or deny

same.

37.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 37 of the Complaint, and, therefore, cannot admit or deny same.

38.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 38 of the Complaint, and, therefore, cannot admit or deny same.

39.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 39 of the Complaint, and, therefore, cannot admit or deny same.

40.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 40 of the Complaint, and, therefore, cannot admit or deny same.

41.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 41 of the Complaint, and, therefore, cannot admit or deny same.

42.

Defendants are without information or knowledge sufficient to form a belief as to the

allegations contained in Paragraph No. 42 of the Complaint, and, therefore, cannot admit or deny same.

43.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 43 of the Complaint, and, therefore, cannot admit or deny same.

44.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 44 of the Complaint, and, therefore, cannot admit or deny same.

45.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 45 of the Complaint, and, therefore, cannot admit or deny same.

46.

Defendants are without information or knowledge sufficient to form a belief as to the allegations contained in Paragraph No. 46 of the Complaint, and, therefore, cannot admit or deny same.

47.

Defendants deny the allegations contained in Paragraph No. 47 of the Complaint.

48.

Defendants deny the allegations contained in Paragraph No. 48 of the Complaint.

49.

Any allegations contained in Plaintiff's Complaint not herein responded to by number, including Plaintiff's *ad damnum* clause, and its subparts are hereby denied.

WHEREFORE, having fully answered, Defendants pray the Complaint be dismissed with costs of this action cast against Plaintiffs.

Dated this 14th day of August, 2023.

Respectfully submitted by,
SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ Elizabeth L. Bentley

ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftcurrie.com
Attorney for Defendants

Swift, Currie, McGhee & Hiers, LLP
1420 Peachtree Street NE, Suite 800
Atlanta, Georgia 30309
(404) 874-8800 Phone
(404) 888-6199 Fax

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Thomas Rainey, Esq.
MORGAN & MORGAN ATLANTA PLLC
PO Box 57007
Atlanta, GA 30343
trainey@forthepeople.com
Attorneys for the Plaintiff

Dated this 14th day of April, 2023.

Respectfully submitted by,
SWIFT, CURRIE, McGHEE & HIERS, LLP

/s/ *Elizabeth L. Bentley*

ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftcurrie.com
Attorney for Defendants
4875-1455-3437, v. 1

IN THE STATE COURT OF FULTON COUNTY
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**DEFENDANTS NEW PRIME AND TYLER COOPER'S
DEMAND FOR JURY PANEL OF TWELVE**

COME NOW New Prime, Inc. and Tyler Cooper (hereinafter "Defendants" or "this defendant"), named defendants in the above-styled action, by and through their attorneys, and demand in writing prior to the commencement of the trial term that the above-styled case be tried by a jury of twelve, pursuant to O.C.G.A. § 15-12-122.

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.
ELIZABETH L. BENTLEY, ESQ.
State Bar No.: 828730
beth.bentley@swiftpcurrie.com
Attorney for the Defendants

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I hereby certify that I have this day served a copy of the within and foregoing ***Defendants New Prime and Tyler Cooper's Demand for Jury Panel of Twelve*** upon all parties via the Odyssey E-File and Serve System which will electronically send an electronic copy of same to the following counsel and parties of record:

Thomas Rainey, Esq.
MORGAN & MORGAN ATLANTA PLLC
PO Box 57007
Atlanta, GA 30343
trainey@forthepeople.com
Attorneys for the Plaintiff

Respectfully submitted this 14th day of April, 2023.

By: /s/ Elizabeth L. Bentley, Esq.

ELIZABETH L. BENTLEY, ESQ.

State Bar No.: 828730

beth.bentley@swiftcurrie.com

Attorney for the Defendant

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1420 Peachtree Street NE, Suite 800
Atlanta, Georgia 30309
(404) 874-8800 Phone
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